

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

Bureau of Consumer Financial Protection, ) Case No. 1:20-cv-04176  
Plaintiff, )  
vs. )  
Townstone Financial, Inc. )  
Defendant. )

**DEFENDANT'S UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMITS  
RELATED TO THEIR MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

Defendant Townstone Financial, Inc. (“Townstone”), by counsel, pursuant to Local Rule 7.1, moves this Court for an Order granting Townstone’s Unopposed Motion For Leave To Exceed Page Limits Related to Their Motion to Dismiss Plaintiff’s Complaint. In support of this motion, Townstone states as follows:

1. Plaintiff Bureau of Consumer Financial Protection (the “Bureau”) filed a complaint on July 15, 2020. The Complaint is 17 pages long and contains 58 paragraphs. It asserts federal claims against Townstone and seeks declaratory relief and monetary damages against Townstone.
2. Pursuant to Fed. R. Civ. P. 12(b)(6), Townstone will move to dismiss all of the Bureau’s claims for failure to state a claim upon which relief can be granted.
3. Local Rule 7.1 provides in relevant part that “[n]either a brief in support of or in opposition to any motion . . . shall exceed 15 pages without prior approval of the court. . . Any brief or objection that does not comply with this rule shall be filed subject to being stricken by the court. *Id.*
4. This case presents complex federal questions including the interpretation of the

applicable statutes and regulations as well as United States Constitutional issues.

5. While the undersigned will make every effort to condense and streamline the arguments in support of the motion to dismiss, we respectfully submit that a memorandum in excess of 15 pages is necessary to fully present all the relevant facts and legal arguments that set out the bases for dismissal in this important case.

6. The undersigned has conferred with opposing counsel regarding this proposed page extensions. Opposing counsel is not opposed to Townstone's request.

WHEREFORE, based on the foregoing, Townstone respectfully requests:

A. That this Court allow Townstone to file its Memorandum in support of Motion to Dismiss in excess of fifteen (15) pages; and

B. That this Court provisionally accept the Memorandum in support of Motion to Dismiss filed by Townstone, which is in excess of fifteen (15) pages.

Respectfully submitted,

/s/ Sean P. Burke

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*Attorneys for Defendant Townstone  
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**CERTIFICATE OF SERVICE**

I hereby certify that on October 20, 2020 a copy of the foregoing was filed electronically. Service of this filing was also made by operation of the Court's CM/ECF system:

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/s/ Sean P. Burke

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